

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF TEXAS
3 AMARILLO DIVISION

4 SPECTRUM WT,)

5 Plaintiff,)

6 v.)

Case No. 2:23-cv-00048

7 WALTER WENDLER, in his)
8 official capacity as the)
9 President of West Texas)
10 A&M University, et al.,)

11 Defendants.)

12 -----
13 ORAL DEPOSITION OF CHIP CHANDLER
14 DECEMBER 9, 2025 - CANYON, TEXAS
15 -----

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19
20 ORAL DEPOSITION OF CHIP CHANDLER, produced as a
21 witness at the instance of the PLAINTIFF and duly sworn,
22 was taken in the above styled and numbered cause on
23 DECEMBER 9, 2025, from 1:00 p.m. to 2:59 p.m., at the
24 offices of WEST TEXAS A&M UNIVERSITY, Old Main Building,
25 Room 317, Canyon, Texas, before SHARON D. LIVINGSTON,
CSR-RPR, in and for the State of Texas, reported by
machine shorthand, and pursuant to the Federal Rules of
Civil Procedure.

A P P E A R A N C E S

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1 MR. MORRIS: Does Mr. Chandler's attorney
2 want to make an appearance?

3 MS. RIVERA: Yeah. Hannah Rivera, on
4 behalf of the witness, Chip Chandler.

5 CHIP CHANDLER,
6 having been first duly sworn, testified as follows:

7 EXAMINATION

8 BY MR. MORRIS:

9 Q. Good afternoon, Mr. Chandler. How are you?

10 A. Doing well. How are you?

11 Q. Good.

12 You understand we're here today to discuss
13 certain issues surrounding President Wendler's decision
14 to cancel a couple drag shows that Spectrum WT had
15 planned in Legacy Hall.

16 Is that right?

17 A. Yes.

18 Q. Okay. Have you ever been deposed before?

19 A. Yes.

20 Q. When?

21 A. Approximately 1997.

22 Q. Okay. What was the case about?

23 A. I was a reporter and was sued for libel.

24 Q. Okay. Is that the only time you've been
25 deposed?

1 accurate testimony here this afternoon?

2 A. No.

3 Q. Did you do anything to prepare for your
4 deposition today?

5 A. Met with my attorney and met with the attorney
6 general's office.

7 Q. Anything else?

8 A. No.

9 Q. About how long did you spend preparing for
10 today's deposition?

11 A. Thursday afternoon.

12 Q. Where are you from originally?

13 A. Canadian, Texas.

14 Q. So you're a native of the Panhandle, then?

15 A. Yes.

16 Q. How long have you been in higher education?

17 A. I have worked for WT since March of 2020.

18 Q. What did you do before that?

19 A. Primarily worked as a reporter.

20 Q. Did you go to journalism school?

21 A. Went to a small regional university in Oklahoma
22 that didn't offer a journalism major, so I was an
23 English major, journalism minor.

24 Q. Fair enough. How long were you a reporter for?

25 A. From about May of '95 until January of '16 with

1 about a five-year break.

2 Q. What made you want to come work at WT?

3 A. I wanted a new job.

4 Q. Fair enough.

5 And what was your role when you started at
6 West Texas A&M?

7 A. Senior communications specialist.

8 Q. And what's your role now?

9 A. Director of University Communications and Media
10 Relations.

11 Q. Generally what are your duties in that role?

12 A. Generally, if the press reaches out for an
13 interview, I'm their primary point of contact for
14 anything not athletics-related. They have their own
15 staff. I write the bulk of the news releases for the
16 university, or rewrite or edit. I do internal email
17 communications, campus fliers, things like that.

18 Q. Okay. This is sometimes an unfair question
19 because none of us have typical days, but what does your
20 most typical day look like here?

21 A. I put out a news release before 9:00 a.m., send
22 it to my media list, hopefully field some interview
23 requests based off of that, get those set up, spend some
24 time writing more news releases for the next day or the
25 next several days ahead, send out a couple of campus

1 emails a day, interview folks, find out what's going
2 on.

3 Q. Okay. As part of your duties, do you work with
4 the president's office?

5 A. Yes.

6 Q. What does some of your work with the
7 president's office involve?

8 A. Writing press releases generally. That's the
9 bulk of it. I write press releases and get quotes from
10 his office.

11 Q. As part of your duties, are you involved in
12 student activities, student affairs, those sorts of
13 things?

14 A. Sometimes, when there's some newsworthiness to
15 the topic or when I think that reporters may be
16 interested in coming out to it. Because there are so
17 many student activities, I have to filter out somehow.

18 Q. Do you have any involvement with events and
19 activities that take place at the JBK Student Center?

20 A. In general, only when it's something that we
21 think a reporter might want to come to.

22 Q. And in that circumstance, do you go and watch
23 the event, or do you talk to the people who are putting
24 it on?

25 How do you evaluate whether or not to

1 advise the media to come out and watch it?

2 A. A lot of times it's a gut feeling. Because
3 I've been a reporter for so long, I kind of know what
4 they're looking for in a story.

5 Also, it depends on the timing. If we have
6 other things going on, do I have time to do another news
7 release and get it to campus.

8 Q. In your five years here, have you gone and
9 attended events at the JBK Student Center?

10 A. Yes.

11 Q. About how many?

12 A. That would be very hard to even estimate.

13 Q. More than ten?

14 A. Certainly.

15 Q. More than 20?

16 A. Yes.

17 Q. More than 50?

18 A. In five years, yes.

19 Q. What is your relationship with Spectrum WT, in
20 your own words?

21 A. Currently, I'm a member of Buff Allies, which
22 provides support for all LGBTQ-plus students, including
23 the Spectrum student organization.

24 Q. What is your role with Buff Allies?

25 A. I'm currently a member.

1 Q. How long have you been a member?

2 A. Probably since sometime in 2021. I started a
3 week before COVID essentially, so I would have joined
4 sooner.

5 Q. Are you aware that there have been past drag
6 performances at West Texas A&M?

7 A. I'm not aware of any before I got here.

8 Q. And you're not aware of any that occurred after
9 you got here either?

10 A. No, I'm not.

11 Q. If I told you there had been past drag shows at
12 Texas A&M [sic] prior to 2020, would that surprise you?

13 A. At Texas A&M?

14 Q. I mean West Texas A&M University.

15 A. Okay. Not necessarily.

16 Q. Why not?

17 A. Because I don't know everything that goes on on
18 campus.

19 MR. BRYANT: Especially before you were
20 here.

21 THE WITNESS: Yeah.

22 Q. (BY MR. MORRIS) You're aware that in 2022,
23 Spectrum submitted an application to host a drag
24 performance at Legacy Hall in spring of 2023?

25 A. Yes.

1 Q. Did you play any role in helping Spectrum
2 prepare that application?

3 A. In preparing the application? No, I did not.

4 Q. Did you advise them on that application?

5 A. Not to my memory, no.

6 Q. What about after they submitted the
7 application?

8 A. At some point, I was sent a flier and asked to
9 look at it.

10 (Exhibit 37 marked.)

11 MR. MORRIS: I'm going to hand the witness
12 Exhibit 37. It's Bates stamped SPECTRUM 0000545. Copy
13 for Mr. Bryant.

14 MR. BRYANT: Thank you.

15 Q. (BY MR. MORRIS) Let me know when you've had a
16 chance to look at this, Mr. Chandler.

17 It's Mr. Chandler, not Dr. Chandler?

18 A. Yes, just "Mister."

19 Q. Okay. Just making sure.

20 A. Thanks.

21 Q. Do you recognize this email?

22 A. It's from me. I don't recall sending it
23 personally.

24 Q. And you see the first email in this chain is
25 from Echo S. Sibley.

1 anything.

2 THE WITNESS: Okay.

3 MR. MORRIS: I'm going to object. That's
4 an improper speaking objection. Make your objection,
5 please, Counsel. Don't coach the witness.

6 Q. (BY MR. MORRIS) You can answer my question,
7 Mr. Chandler.

8 A. As I recall, we had spoken at some point that
9 Spectrum wanted to do a drag show, and I was asking for
10 more details.

11 Q. Okay. And you see at the top, Mr. Bright
12 writes back to you. "As for the MC, they introduce the
13 contestants via their stage name with a catchphrase that
14 the contestant gives them before the event."

15 Did you have any reason to doubt that what
16 Mr. Bright told you was anything different than what
17 they intended the MC of the show to do?

18 A. No.

19 Q. Have you attended drag shows before?

20 A. Yes.

21 Q. In your experience, is it pretty typical for an
22 MC to introduce the contestants via their stage name?

23 A. Yes.

24 Q. And with a catchphrase that the contestant
25 gives them before the event?

1 A. Yes.

2 Q. Is there a difference, in your experience at a
3 drag performance, between what an MC does and what the
4 performers do?

5 A. Can you clarify what you're asking there?

6 Q. Yeah. For example, an MC at a drag
7 performance, in your experience, is that a role
8 different from sort of a standard performer?

9 A. I'm not exactly sure what you're asking. An MC
10 could be a performer in a show or could just be a host
11 of a show.

12 Q. But here, you would agree with me that
13 Mr. Bright is indicating that the MC is to introduce the
14 contestants with a catchphrase.

15 He doesn't mention anything about
16 performance, correct?

17 A. That's what this email says.

18 Q. Okay. You can go ahead and set that aside.

19 (Exhibit 38 marked.)

20 MR. MORRIS: I'll hand the witness what I'm
21 marking as Exhibit 38. It's Bates stamped SPECTRUM
22 0000753.

23 Q. (BY MR. MORRIS) Let me know, Mr. Chandler,
24 when you've had an opportunity to look at this document.

25 A. Okay.

1 Q. Do you know what this is?

2 A. It says it's "A Fool's Drag Race" Meeting,
3 January 26th.

4 Q. And it lists you in a list of names here. Is
5 that correct?

6 A. It does.

7 Q. Fair to say this is a list of folks who
8 attended this "Fool's Drag Race" meeting on January
9 26th?

10 A. I don't know if everybody attended, but it's a
11 list of people who were going to participate in some way
12 or another.

13 Q. Do you remember attending this meeting?

14 A. I don't remember if I did or not.

15 Q. Any reason to believe that you didn't?

16 A. No.

17 Q. Did you attend meetings with Spectrum officers
18 and other campus members to plan the "Fool's Drag Race"
19 that they were to perform in 2023?

20 A. Yes.

21 Q. If you look on the back side of this document,
22 the second page, you see the third line from the bottom
23 where it has three exclamation points on both sides of
24 "PG-13."

25 Do you see that?

1 A. I don't know if any of the students are student
2 employees or not. I'm the only non-student on that list
3 that I know of.

4 Q. Okay. But assuming that you would have
5 attended this meeting, since you had no reason to
6 believe that you didn't, you at least would have known
7 by this time that the students intended the drag
8 performance to be PG-13?

9 MR. BRYANT: Objection to the hypothetical.

10 A. Yes.

11 Q. (BY MR. MORRIS) You can go ahead and set that
12 aside, Mr. Chandler.

13 (Exhibit 39 marked.)

14 MR. MORRIS: I'll hand the witness what I'm
15 marking as Exhibit 39. It's Bates stamped SPECTRUM
16 0000792. Copy for Mr. Bryant.

17 MR. BRYANT: Thank you.

18 Q. (BY MR. MORRIS) Mr. Chandler, let me know
19 when you've had a chance to look at this document.

20 A. Yes.

21 Q. Can you tell me what this is?

22 A. It's an email chain about the posters for the
23 event, the "Fool's Drag Race."

24 Q. Planned for spring 2023 in Legacy Hall?

25 A. Yes.

1 Q. And every email in this chain is dated February
2 16th, 2023, right?

3 A. Yes.

4 Q. To your recollection, why were you included on
5 an email chain about posters for Fool's Drag Race?

6 A. In 2023, I was the co-leader of Buff Allies.

7 Q. Okay. When you were the co-leader, were you
8 participating in your capacity as a West Texas A&M
9 employee or in your individual capacity or both?

10 A. Buff Allies is a group for WT faculty and
11 staff, so yes.

12 Q. So both or just as an employee?

13 A. Can you rephrase?

14 Q. Yeah, let me rephrase my question.

15 When you were the co-chair of Buff Allies
16 at the time in 2023, were you serving as co-chair in
17 your capacity as an employee of West Texas A&M
18 University?

19 A. I served because I am an employee of West Texas
20 A&M University.

21 Q. How many members does Buff Allies have?

22 A. I don't recall how many members we had at the
23 time.

24 Q. More than ten?

25 A. Yes.

1 Q. More than 20?

2 A. Yes.

3 Q. Did you discuss the planning for Fool's Drag
4 Race with other members of Buff Allies?

5 A. With Echo Sibley, the co-leader.

6 Q. Anybody else?

7 A. And with Kris Drumheller, who was the faculty
8 advisor for Spectrum.

9 Q. Anybody else?

10 A. Anne Medlock, who had previously been a leader
11 of Buff Allies.

12 Q. Okay. So fair to say there were a number of
13 employees and faculty who were aware of what was being
14 planned for Fool's Drag Race?

15 A. At least three.

16 Q. If not four?

17 A. Four with me, yeah.

18 Q. If you go down to the second email in this
19 chain, it's an email from you to Ransom Colette and Bear
20 Bright?

21 A. Yes.

22 Q. You talk about some of your concerns here and
23 ways to address those. You say, "We definitely need to
24 include that this is a fundraiser for the Trevor
25 Project," and you're suggesting to Bear and Ransom that

1 they should put that on the flier or poster?

2 A. That's how I read this, yes.

3 Q. To your recollection, did that appear on the
4 final poster that was advertised?

5 A. I can't remember what the final poster looked
6 like.

7 Q. Okay. In here, you're also suggesting to
8 Ransom and Bear that the flier should reflect that they
9 had planned the show to be PG-13.

10 Is that right?

11 A. That's what it says here, yes.

12 Q. Okay. And again, at this point, it was clear
13 that the students had planned the show to be PG-13,
14 correct?

15 A. I'm asking them if that's what was decided.

16 Q. To your recollection, did that ever change
17 between the time you started planning the show and the
18 time the show was canceled?

19 A. Not to my recollection.

20 Q. You say here in the last line of this email,
21 "And I think it needs to have a little description of
22 what's going on: Student orgs compete to see who's the
23 fiercest of them all maybe?"

24 Why did you suggest that, the best you
25 recall?

1 A. The best I can recall, it was just so that
2 people looking at the poster would know what it is.

3 Q. Okay. Why did you choose the word "fiercest?"
4 Does that have a special connotation for this kind of
5 event?

6 A. Yes.

7 Q. Okay. What is that connotation?

8 A. It's just common slang or a commonly used turn
9 of phrase in the LGBTQ-plus community.

10 Q. Okay. Can you explain to me sort of what its
11 common understanding is? I'm sorry to put you on the
12 spot. I'm just trying to understand myself here.

13 A. To be fierce is to be the best essentially.

14 Q. Okay. You can set that aside.

15 (Exhibit 40 marked.)

16 MR. MORRIS: I'm going to mark now as
17 Exhibit 40 what's Bates stamped SPECTRUM 0000822.

18 Mr. Bryant?

19 MR. BRYANT: Thank you.

20 Q. (BY MR. MORRIS) Mr. Chandler, let me know
21 when you've had a chance to look at this.

22 A. Yes.

23 Q. This is an email from you to Mr. Bright?

24 A. Yes.

25 Q. And is it your understanding at that time that

1 Mr. Bright was the president of Spectrum WT?

2 A. Correct.

3 Q. And Lauren Stovall was the vice president at
4 that time?

5 A. Correct.

6 Q. What are you telling Mr. Bright in this email?

7 A. I'm giving him a short description and a long
8 description as suggestions, I would think.

9 Q. For the Fool's Drag Race show?

10 A. Yes.

11 Q. Why would you be giving him those suggested
12 descriptions?

13 A. I don't recall.

14 Q. Did Mr. Bright ask you to help come up with
15 descriptions for the show?

16 A. I don't recall.

17 Q. Would you have been giving these descriptions
18 as part of your participation at this time as a co-chair
19 of Buff Allies?

20 A. Yes.

21 Q. And you see under your long description, you
22 say, "The night's MC is popular Amarillo drag queen Myss
23 Myka."

24 Do you see that?

25 A. Yes.

1 email, I respond.

2 Q. But you could have said, "I see concerns here,"
3 right, if you had? I mean, if you had seen anything
4 concerning on this form, would you have said, "This
5 doesn't look good to me," or "I have concerns about
6 this?"

7 MR. BRYANT: Objection; calls for
8 speculation.

9 A. If something had not looked good to me, I would
10 have said, "Here's a suggestion."

11 Q. (BY MR. MORRIS) And if something didn't look
12 good to you, you wouldn't have said, "This looks good to
13 me," correct?

14 A. Correct.

15 Q. Do you see here on the bottom of the first page
16 where it says "Tentative Confirmation?"

17 A. I do.

18 Q. Given your experience as a leader of Buff
19 Allies, an employee of WT, and your involvement in JBK
20 events, does that suggest to you that the Fool's Drag
21 Race had received tentative confirmation at this time?

22 A. Based on what I read here, yes.

23 Q. Okay. You can set that aside.

24 (Exhibit 42 marked.)

25 MR. MORRIS: I'll go ahead and mark this as

1 Exhibit 42. I apologize it doesn't have a Bates stamp
2 on it, and I'm not sure what our production number is.
3 We can look it up and provide one after the deposition.
4 It's obviously something we produced.

5 MR. BRYANT: Thank you.

6 Q. (BY MR. MORRIS) Let me know when you've had a
7 chance to look at this, Mr. Chandler.

8 A. Okay.

9 Q. It looks like an email chain between several
10 folks at West Texas A&M University.

11 Is that correct?

12 A. Yes.

13 Q. Do you remember this email chain at all?

14 A. Vaguely.

15 Q. Is it fair to say this is a discussion among
16 Mr. Bright, yourself, JBK Center staff, and Ransom
17 Colette, about the flier for the 2023 Fool's Drag Race?

18 A. Yes.

19 Q. And on Page 2 of 6, you see an email down there
20 from Shawn Fouts.

21 Who is Shawn Fouts?

22 A. Shawn Fouts, at the time, was the senior
23 director of Campus Community.

24 Q. Was he in charge of or had a role in overseeing
25 what events took place at JBK?

1 A. To my knowledge, yes.

2 Q. And here, he says in regards to the flier, "I'm
3 not the expert, but I think it looks great, Colette."

4 And then he asks, "Chip and Evelyn?"

5 Fair to say that Dr. Fouts is asking for
6 your view about how the flier looks?

7 A. I would speculate that yeah, that's what he's
8 asking.

9 Q. Do you know who Evelyn Montoya is?

10 A. Yes.

11 Q. Who is she?

12 A. Evelyn works in Student Affairs and does
13 marketing materials for them.

14 Q. Okay. In response to Dr. Fouts, you say,
15 "Agreed," yes?

16 A. Yes.

17 Q. That was a truthful statement you made?

18 A. Yes.

19 MR. MORRIS: Is there a problem with my
20 question, Mr. Bryant?

21 MR. BRYANT: I didn't object.

22 MR. MORRIS: Okay.

23 Q. (BY MR. MORRIS) Fair to say, based on this
24 email chain, that there were multiple staff of West
25 Texas A&M University involved in reviewing and approving

1 the flier for the Fool's Drag Race event?

2 A. Based on this email chain, there were several
3 eyes on that flier.

4 Q. And based on your recollection, is that what
5 happened, that there were several eyes on the Fool's
6 Drag Race flier?

7 A. Based on my recollection and this email chain,
8 there were these eyes on it.

9 Q. Does this email refresh your recollection about
10 what happened in terms of the flier being approved?

11 A. Somewhat.

12 Q. Okay. You can set that aside for now.

13 (Exhibit 43 marked.)

14 MR. MORRIS: I'm going to mark this as
15 Exhibit 43. It's Bates stamped SPECTRUM 0000860.

16 Mr. Bryant.

17 MR. BRYANT: Thank you.

18 Q. (BY MR. MORRIS) Mr. Chandler, do you know
19 what this document is?

20 A. It's an email from Dr. Fouts to Bear and myself
21 about the Fool's Drag Race.

22 Q. Okay. And this email confirms the Fool's Drag
23 Race received tentative approval as of March 14th, 2023?

24 A. Yes.

25 Q. Why would Dr. Fouts have sent this to you as

1 Q. So we talked and established earlier in this
2 deposition that Spectrum made clear that the Fool's Drag
3 Race would be a PG-13 show, right?

4 MR. BRYANT: Objection; leading.

5 A. Yes.

6 Q. (BY MR. MORRIS) In your personal perspective,
7 what did PG-13 mean to you?

8 A. Personally, it's borrowing from the MPAA rating
9 system for movies.

10 Q. Okay. Does the university use that rating
11 system in other student events or university events that
12 it puts on?

13 A. I can't remember off the top of my head if the
14 theater department uses that kind of rating system or
15 something similar.

16 Q. So to your knowledge, Spectrum WT made clear
17 that no minors would be allowed at Fool's Drag Race
18 unless they had a parent or guardian with them.

19 Is that right?

20 A. To my knowledge, yes.

21 Q. Any reason to believe they would have deviated
22 from that?

23 A. No.

24 Q. To your recollection, the students made clear
25 that the performers were not allowed to use profane

1 music during their performance.

2 Is that right?

3 A. To my knowledge, yes.

4 Q. Okay. I want to step back because I don't want
5 to mischaracterize your role here.

6 If I say "during your time helping
7 Spectrum" or "guiding Spectrum in putting on Fool's Drag
8 Race," is that fair to say?

9 A. Yes. But can I clarify something?

10 Q. Please do.

11 A. Okay.

12 Q. I don't want to mischaracterize your role.

13 A. I was the co-leader of Buff Allies, which is
14 the support organization for all LGBTQI-plus students.
15 Spectrum had a faculty advisor, and I was not that
16 faculty advisor, but I did help out when asked.

17 Q. Okay. If I say "your role supporting Spectrum
18 WT as it planned its Fool's Drag Race show," would that
19 be more fair?

20 A. Yes.

21 Q. During your time supporting Spectrum WT's
22 efforts to host Fool's Drag Race at Legacy Hall -- and
23 again, just asking for your knowledge and experience --
24 did anyone on staff at West Texas A&M University raise
25 concerns that the show would be lewd?

1 A. Not to my recollection, no.

2 Q. Did anyone on staff at West Texas A&M
3 University, during your time supporting students'
4 efforts to host the drag show, raise concerns about it
5 being sexualized or anything more than PG-13?

6 A. Not to my recollection, no.

7 Q. Did anyone at that time raise concerns about
8 minors being prohibited from attending without having
9 parental consent and supervision?

10 A. Not to my recollection.

11 Q. Based on your experience supporting Spectrum's
12 efforts to host a drag show at Legacy Hall in 2023,
13 would you say the students were cautious in planning the
14 show?

15 A. Yes.

16 MR. MORRIS: This is a good spot to take a
17 short break.

18 MR. BRYANT: Sure.

19 (Recess 1:47 p.m. to 1:57 p.m.)

20 Q. (BY MR. MORRIS) Mr. Chandler, before the
21 break, we were speaking about your efforts to support
22 Spectrum as they intended to put on Fool's Drag Race in
23 Legacy Hall in 2023.

24 You supported them through your capacity as
25 a co-chair of Buff Allies, correct?

1 A. Yes.

2 Q. And participating in Buff Allies, that's not
3 part of your job description or job duties, correct?

4 A. No.

5 Q. You don't get paid to be in Buff Allies?

6 A. No.

7 Q. You didn't get paid to help support Spectrum in
8 their planning of the show?

9 A. No.

10 Q. Based on your experience in supporting
11 Spectrum, in your view, it was entirely the students'
12 ideas in their planning. You were just there supporting
13 them.

14 Is that fair?

15 A. That's fair.

16 Q. Same for Ms. Sibley?

17 A. Yes.

18 Q. Same for Ms. Drumheller?

19 A. Dr. Drumheller.

20 Q. Dr. Drumheller?

21 A. Yes.

22 Q. Okay. Did President Wendler ever raise any
23 concerns he had about Fool's Drag Race?

24 A. I'm sorry. Could you repeat that?

25 Q. Yeah. Did President Wendler ever contact you

1 about Fool's Drag Race?

2 A. No.

3 Q. Did Dr. Fouts ever raise concerns with you
4 about Fool's Drag Race?

5 A. Just questions in those emails. Beyond that,
6 none, to my recollection.

7 Q. So to your recollection, just questions about
8 complying with the reservation requirements for Legacy
9 Hall?

10 A. Not to my recollection, no.

11 Q. What were the questions he raised?

12 A. Primarily, it was about the poster marketing.

13 Q. Just the marketing of the poster?

14 A. To my recollection.

15 (Exhibit 44 marked.)

16 MR. MORRIS: I'm going to hand the witness
17 what I'm marking as Exhibit 44. This is SPECTRUM
18 0000368.

19 Mr. Bryant.

20 MR. BRYANT: Thank you.

21 Q. (BY MR. MORRIS) Mr. Chandler, have you had a
22 chance to look at this document?

23 A. Yes.

24 Q. What is this?

25 A. This is a news release that I wrote about the

1 upcoming performance of a musical called "Title of Show"
2 from WT Theater.

3 Q. Okay. These news releases that you write and
4 publish, are these official news releases from WT?

5 A. Yes.

6 Q. This is a news release dated March 31st, 2021,
7 correct?

8 A. Yes.

9 Q. On the second page, about halfway down, it
10 says, "The show is considered to be rated R for strong
11 language."

12 Do you see that?

13 A. I do.

14 Q. Is it commonly the university's practice to put
15 R ratings on theatrical productions that have strong
16 language?

17 A. The university?

18 Q. Well, who decides how to rate or what rating to
19 give a theatrical production?

20 A. The theater department.

21 Q. So that would be theater faculty?

22 A. Yes.

23 Q. You see here that even though it's considered
24 to be rated R, the press release advertises "tickets for
25 families."

1 Is that accurate?

2 A. Yes, that's what it says.

3 Q. Any reason you would have included that if the
4 university wasn't selling tickets for families?

5 A. As I recall, this show was staged -- yes, it
6 says in the second paragraph that this show was staged
7 in video-on-demand performances, so this wasn't a live
8 performance.

9 Q. Okay.

10 A. As I recall, they were selling a package, which
11 might have had something to do with rights issues.

12 Q. Okay. But they were still selling tickets to
13 families, correct?

14 A. That's what it says here.

15 Q. This is dated 2021. At the bottom of the page,
16 you write, "A commitment to the arts is a key component
17 of the university's long-term plan."

18 Do you see that?

19 A. Yes.

20 Q. Was that accurate in 2021?

21 A. Yes.

22 Q. To the best of your knowledge, is that accurate
23 today?

24 A. That's what's in the plan, yes.

25 Q. So it was accurate also in 2023?

1 A. Yes.

2 Q. And 2024?

3 A. Yes.

4 Q. You can set that aside for now.

5 (Exhibit 45 marked.)

6 MR. MORRIS: I'm going to hand the
7 witness what I'm marking as Exhibit 45. It's Bates
8 stamped SPECTRUM 0000417.

9 Q. (BY MR. MORRIS) Mr. Chandler, do you recognize
10 this document?

11 A. Yes.

12 Q. What is it?

13 A. It is a news release about the WT Theater
14 production of "As You Like It."

15 Q. So this is an official press release from the
16 university?

17 A. Yes.

18 Q. And it's dated February 1st, 2022?

19 A. Yes.

20 Q. And you see below here in the fourth to last
21 paragraph of the first page, it says that this is a
22 production of "one of Shakespeare's more popular
23 romantic comedies, 'Rosalind.'"

24 Do you see that?

25 A. It says, "In the play, one of Shakespeare's

1 more popular romantic comedies, 'Rosalind,' " yes.

2 But to be clear, "Rosalind" is the name of
3 a character.

4 Q. A character. Okay.

5 So this is a press release about a
6 Shakespeare play being produced?

7 A. Yes.

8 Q. And it says below that, on this official West
9 Texas A&M press release, "The play is ahead of its time,
10 Venter said, in its exploration of gender fluidity."

11 Do you see that?

12 A. Yes, that's what it says.

13 Q. Who is Venter?

14 A. That's Carley Venter, a student actor.

15 Q. Okay. And below that, it says, "Androgyny is
16 very human, so when we play with gender in this play,
17 it's very natural, Venter said."

18 Is that correct?

19 A. That's what she said, yes.

20 Q. Did you interview Venter to get these quotes?

21 A. Yes.

22 Q. To the best of your knowledge, did anybody
23 complain about this production of "As You Like It"?

24 A. Not to my knowledge.

25 Q. Did people buy tickets to come see it?

1 (Exhibit 46 marked.)

2 MR. MORRIS: I'm going to hand the witness
3 what I'm marking as Exhibit 46. It's Bates stamped
4 SPECTRUM 0003369.

5 MR. BRYANT: Thank you.

6 Q. (BY MR. MORRIS) Mr. Chandler, do you
7 recognize what's been handed to you as Exhibit 46?

8 A. Yes.

9 Q. Can you explain what it is?

10 A. It's a press release for WT Theater's
11 production of "A Funny Thing Happened on the Way to the
12 Forum."

13 Q. And it's dated April 16th, 2025?

14 A. Yes.

15 Q. So just this year, right?

16 A. Yes.

17 Q. Did you attend this show, if you remember?

18 A. I did.

19 Q. In this press release, Echo Sibley says that
20 "WT Theater considers the musical to be rated PG-13
21 because of suggestive humor?"

22 A. That's what it says, yes.

23 Q. When you went and saw the show, did it appear
24 to be PG-13 to you?

25 Let me rephrase. Did you have any reason

1 to believe that PG-13 was an inappropriate rating for
2 the production?

3 A. If I thought about it, probably I didn't have
4 any reason to think it was or not.

5 Q. Sure. And it says here, "This show is all
6 about class systems, masters and slaves trying to one-up
7 each other."

8 Is that what this press release says?

9 MR. BRYANT: Objection; the document speaks
10 for itself.

11 A. I'm looking for that line.

12 Q. (BY MR. MORRIS) It's in the paragraph that
13 says "we're approaching."

14 A. Yes.

15 Q. And Sibley says, "It has a cartoony feel."

16 In your experience seeing this show, is
17 that an accurate depiction?

18 A. Yes.

19 Q. Do you think that cartoony feel required
20 anything more than a PG-13 rating, based on your
21 experience seeing the show and being familiar with the
22 PG-13 rating?

23 A. No.

24 Q. The fact that this show is about masters and
25 slaves trying to one-up each other, did that give you

1 any concern that PG-13 was too low of a rating for this
2 production, again, based on your experience seeing the
3 show?

4 A. No.

5 Q. Okay. You can set that aside.

6 To your knowledge, did the university
7 receive any complaints about "A Funny Thing Happened on
8 the Way to the Forum"?

9 A. Not to my knowledge.

10 Q. If someone were to complain about a theatrical
11 production, do you think you would know about it?

12 A. Maybe.

13 Q. Just kind of through the grapevine or through
14 your duties as communications director?

15 A. It could be both.

16 (Exhibit 47 marked.)

17 MR. MORRIS: I'll mark as Exhibit 47 what's
18 been Bates stamped SPECTRUM 0003858.

19 MR. BRYANT: Thanks.

20 Q. (BY MR. MORRIS) Mr. Chandler, let me know when
21 you've had a chance to look at this.

22 A. Yes.

23 Q. Can you tell me what this is?

24 A. It's a press release about an art exhibition in
25 October. Well, actually, I guess it opened in November.

1 Q. November of this year?

2 A. Yes.

3 Q. All right. And is this an official press
4 release from West Texas A&M University?

5 A. Yes.

6 Q. And is this a press release promoting an art
7 exhibit depicting nude bodies in large pieces?

8 A. Yes.

9 Q. There's no rating conveyed here, PG-13 or R, I
10 assume because art exhibitions like this typically don't
11 get ratings from the university or art department?

12 MR. BRYANT: Objection; leading.

13 A. There's no rating for it, and I don't usually
14 have a rating in an art exhibition. It's not provided
15 to me is what I should say.

16 Q. (BY MR. MORRIS) There's nothing on here
17 limiting attendance at this art exhibition to 18-plus or
18 anything like that, correct?

19 A. Nothing in this release.

20 Q. Okay. And based on your experience supporting
21 Spectrum WT in planning their drag show, they didn't
22 plan on having nudity or their performance being nude at
23 their show, correct?

24 A. Not that I recall, no.

25 Q. Do you have any reason to believe that they

1 would have?

2 A. No.

3 Q. Did you attend this exhibition?

4 A. I believe so.

5 Q. And you've been part of the West Texas
6 community for five years now.

7 Is that right?

8 A. I've worked at WT for five years, but I've been
9 in this community for a long time.

10 Q. Yeah, you're from Canadian. You've been a
11 long-time member of the Panhandle community.

12 Anything in this exhibition, when you
13 visited, that you thought was out of place or
14 inappropriate for a public-university campus?

15 A. In my opinion, no.

16 Q. In your opinion, anything in this exhibition
17 that was contrary to what folks here in the Panhandle
18 might view as inappropriate for a public-university
19 campus?

20 A. In my personal opinion, no.

21 Q. And you think probably some people in the
22 Panhandle might disagree with your opinion, correct?

23 A. Lots of people disagree with lots of my
24 opinions.

25 Q. Sure. But even though people might have

1 disagreed with it, the university let this exhibition of
2 artistic nude bodies go forward, right?

3 A. Yes.

4 Q. To your knowledge, did anybody complain about
5 this exhibition being displayed at West Texas A&M
6 University?

7 A. I was not told of any, no.

8 Q. All right. You can set that aside.

9 Given the documents we just went through
10 and the fact that West Texas A&M is using terms like
11 "PG-13" and "R-rated" in its press releases, in your
12 experience, is it fair to say that the university has a
13 general understanding about what those ratings mean?

14 A. Yes.

15 Q. So how did you learn that President Wendler was
16 canceling "Fool's Drag Race"?

17 A. My boss, Dr. Todd Rasberry, called me and asked
18 me to come to his office, and he showed me the memo.

19 Q. Do you know why Dr. Rasberry would have called
20 you to his office specifically?

21 A. It would be speculation, but he didn't --

22 MR. BRYANT: Don't speculate.

23 Q. (BY MR. MORRIS) You can answer the question.

24 MR. BRYANT: I object as speculation.

25 A. Because there was potential for media

1 Q. Were you asked to by anybody?

2 A. No.

3 Q. Were you told that President Wendler's memo was
4 the university's official stance on "Fool's Drag Race"?

5 A. I don't recall that I was told that that was
6 the university's official stance.

7 Q. Were you told, in response to making inquiries,
8 that you should share President Wendler's March 20th
9 memo?

10 A. Yes.

11 Q. Who told you that?

12 A. I believe Dr. Rasberry.

13 Q. Did you ever talk with Dr. Wendler after he
14 published that March 20th memo?

15 MR. BRYANT: Regarding the memo or just in
16 general?

17 MR. MORRIS: Just in general.

18 A. In general, I speak with President Wendler
19 frequently.

20 Q. (BY MR. MORRIS) Did you ever discuss his
21 decision to cancel "Fool's Drag Race" with him?

22 A. No.

23 Q. When you learned about President Wendler's
24 decision, what was your reaction personally?

25 A. Personally? I didn't agree with it.

1 A. I don't recall.

2 Q. And you don't know why Bear would be asking you
3 those questions about the show that Spectrum planned?

4 MR. BRYANT: Objection; calls for
5 speculation.

6 A. I don't recall.

7 Q. (BY MR. MORRIS) While you were supporting the
8 students at Spectrum in planning and trying to put on
9 "Fool's Drag Race," had you ever been in touch with Myss
10 Myka at that time?

11 A. I can't recall if I was or if Bear was.

12 Q. A couple weeks after President Wendler canceled
13 the "Fool's Drag Race" at Legacy Hall, the students held
14 a drag show in Amarillo, correct?

15 A. Correct.

16 Q. And it was at a public park?

17 A. Yes.

18 Q. Did you attend that show?

19 A. Yes.

20 Q. Did you support Spectrum in planning and
21 putting on that show?

22 A. In my personal time, yes.

23 Q. So that wasn't part of your job duties?

24 A. No.

25 Q. Was that even part of your capacity as a

1 co-chair of Buff Allies?

2 A. Under a broad spectrum. It was just to support
3 the students.

4 Q. Why was it important for you to do that?

5 A. Because they were students who needed some
6 help.

7 Q. Do you recall what you did to support the
8 students in putting on the drag show at Sam Houston
9 Park?

10 A. I helped them find a sound system. I helped
11 them file their application to reserve a space in the
12 park, by which I mean I reviewed what they read. I just
13 helped them spread the word in general. Those are the
14 things that I recall.

15 Q. Sure. And you attended the performance,
16 correct?

17 A. Correct.

18 Q. Did you watch the performance?

19 A. Yes.

20 Q. About how many people were there, to your
21 recollection and best estimate?

22 A. To my recollection, a couple hundred.

23 Q. Did the performance you saw at Sam Houston Park
24 match what you would have expected the performance at
25 Legacy Hall to be?

1 A. I believe so, yes.

2 Q. Any reason to believe that the performance at
3 Legacy Hall would have deviated materially from the
4 performance put on at Sam Houston Park?

5 A. I don't remember if community drag queens were
6 going to perform at the Legacy Hall event. I believe,
7 because it was on campus, there might have been a few
8 more student organizations who took part.

9 Q. With sponsoring and that sort of thing?

10 A. Yeah.

11 Q. So let me phrase this slightly different.

12 In terms of the content of the
13 performance at Sam Houston Park, did that materially
14 differ from what you would have expected the content of
15 the performance at Legacy Hall to be?

16 A. Not that I recall.

17 Q. Would you describe what you saw at Sam Houston
18 Park as an artistic performance?

19 A. Yes.

20 Q. Were there lights?

21 A. I don't recall if there were lights or not.

22 Q. Was there choreographed dancing?

23 A. There was dancing.

24 Q. And was there choreographed music?

25 A. Yes.

1 Q. And was there choreographed dancing to music
2 and costumes that the performers chose themselves?

3 A. Yes.

4 Q. And was it on a stage?

5 A. Yes.

6 Q. Police were present at the performance at Sam
7 Houston Park.

8 Do you recall that?

9 A. Yes.

10 Q. Did they try to stop any of the performers?

11 A. Not that I recall, no.

12 Q. To your knowledge, did they try to shut the
13 show down?

14 A. No.

15 Q. To your knowledge, did they issue any citations
16 to any of the performers?

17 A. No.

18 Q. Did you see any nudity during the performance
19 at Sam Houston Park?

20 A. No.

21 Q. Did you see anything lewd?

22 A. No.

23 Q. Did you see any simulated sex?

24 A. No.

25 Q. Did you see anything that was sexual conduct?

1 A. No.

2 Q. We talked earlier today about how you've seen,
3 in five years, at least over 50 events at the JBK
4 Student Center, right?

5 A. Yeah.

6 Q. And the show that you saw at Sam Houston Park,
7 would that have been out of place at Legacy Hall, given
8 your experience seeing other events on campus?

9 MR. BRYANT: Objection; vague.

10 A. I've seen a wide variety of events in JBK.

11 Q. (BY MR. MORRIS) Based on your experience, was
12 the performance at Sam Houston Park the type of
13 performance or event that would fit in with all those
14 other events you've seen at JBK?

15 MR. BRYANT: Objection; vague.

16 A. I've never seen a drag show in there before, so
17 it would be different just in that respect.

18 Q. (BY MR. MORRIS) Any reason to believe the show
19 you saw at Sam Houston Park would have been
20 inappropriate for Legacy Hall?

21 A. In my personal belief, no.

22 Q. And in your experience, seeing over 50 events
23 at JBK?

24 A. Many of those events were lectures, so it's
25 apples and oranges.

1 Q. Okay. How about the theatrical performances
2 that we talked about earlier? Anything that you saw at
3 the show at Sam Houston Park that would have been
4 materially inconsistent or inappropriate for that
5 theater venue?

6 A. No.

7 Q. Was Myss Myka at the Sam Houston Park
8 performance?

9 A. I believe so, yes.

10 Q. Did she emcee?

11 A. I believe so, yes.

12 Q. Did she announce the performers?

13 A. As the MC, yes.

14 Q. Did she simulate sex?

15 A. Not that I recall, no.

16 Q. Did she simulate masturbation?

17 A. Not that I recall, no.

18 Q. Was she fully clothed?

19 A. Yes, as far as I recall.

20 Q. Are you aware that in 2023, Spectrum submitted
21 an application to host a 2024 drag show at Legacy Hall?

22 A. Yes.

23 Q. And it was called the "Buffalo Drag Show," I
24 think?

25 A. I do not recall that.

1 Q. Okay. We'll call it the "2024 drag show" or
2 "drag performance."

3 A. Okay.

4 Q. Did you support Spectrum's efforts to plan and
5 put on that 2024 drag show?

6 A. I think at that point, I had moved out of the
7 co-leader position, but I'm not 100 percent sure.

8 Q. So you don't recall whether or not you
9 supported them the same way you did in 2023?

10 A. I don't recall.

11 Q. Did it surprise you that President Wendler
12 canceled "Fool's Drag Race"?

13 A. Personally, yes.

14 Q. Did it surprise you that he canceled the show
15 planned for 2024?

16 A. No.

17 Q. Was that because he had already canceled the
18 2023 show?

19 A. He had already canceled one, yes.

20 Q. Did you have any role in supporting Spectrum's
21 planning of the 2024 drag show?

22 A. Not that I recall, no.

23 MR. MORRIS: Let's go ahead and take a
24 break.

25 MR. BRYANT: Okay.

1 (Recess 2:40 p.m. to 2:49 p.m.)

2 Q. (BY MR. MORRIS) Mr. Chandler, in part of this
3 litigation, the parties have exchanged a number of
4 documents, emails and text messages, as you've seen.

5 A. Yes.

6 Q. Were you ever asked to search your emails for
7 documents related to this case?

8 A. No.

9 Q. Ever asked to search your text messages for
10 documents related to this case?

11 A. No.

12 MR. MORRIS: I have no further questions
13 at this time. Pass the witness.

14 MR. BRYANT: I have just a few questions.

15 EXAMINATION

16 BY MR. BRYANT:

17 Q. Mr. Chandler, plaintiff's counsel asked you
18 about Exhibit 40. If you'd turn to that.

19 A. Okay.

20 Q. This appears to be an email dated February
21 27th, 2023 from you to Mr. Bright.

22 One of the items mentioned in the second
23 paragraph of the portion that is described as "long," it
24 says, "The night's MC is popular Amarillo drag queen
25 Myss Myka, and the judge's panel will include Amarillo

1 drag performers and other special guests."

2 Do you recall any of the Amarillo drag
3 performers who were then anticipated to participate in
4 the proposed Spectrum drag show in 2023 in Legacy Hall?

5 A. I don't recall other than Myss Myka.

6 Q. Okay. And there's also a reference to "other
7 special guests."

8 Do you have any knowledge as to what that
9 referred to?

10 A. I don't. I don't recall.

11 Q. A later document that we looked at, Exhibit 50,
12 refers to a person named "Lindsey Adams."

13 Do you know who Lindsey Adams is?

14 A. Lindsey Adams is an Amarillo drag queen.

15 Q. Do you know Lindsey Adams personally?

16 A. As an acquaintance, yes.

17 Q. Have you seen Lindsey Adams perform as a drag
18 queen?

19 A. Yes.

20 Q. Approximately how many times?

21 A. Several.

22 Q. And I know you've been around the area for a
23 long time. Would you say more than five?

24 A. Probably, yes.

25 Q. And there's also a performer referred to as

1 "Azariah?"

2 A. I see that, yes.

3 Q. Do you know that person?

4 A. I do.

5 Q. Have you seen Azariah perform as a drag queen
6 at drag shows?

7 A. Yes, I have.

8 Q. Approximately how many times have you seen
9 Azariah perform as a drag queen in the Amarillo or
10 Canyon areas?

11 A. Approximately more than five.

12 Q. Now, you described the drag show that Spectrum
13 put on in Sam Houston Park that you attended.

14 Was that approximately two weeks after the
15 scheduled March 30th or 31st, 2023 drag performance that
16 did not occur in Legacy Hall?

17 A. As I recall, I believe it was on the same
18 weekend that the planned show was supposed to happen,
19 but approximately a week or two weeks after it was
20 canceled.

21 Q. Oh, okay.

22 So it would have been, to the best of your
23 recollection, within a week or so of March 31st, 2023?

24 A. As I recall, it was that weekend.

25 Q. And from your testimony, I know you helped

1 Spectrum pull that together with sound systems and other
2 support.

3 Was Spectrum able to get whatever kind of
4 local government permission it needed to hold that show
5 within that period?

6 A. Yes.

7 Q. I believe you testified that you thought a
8 couple hundred people attended that performance.

9 Is that right?

10 A. Yes.

11 Q. Do you know what the expected attendance was
12 for the performance at Legacy Hall that was canceled?

13 A. I don't recall.

14 Q. Do you know whether the event that actually
15 occurred at Sam Houston Park in 2023 around the same
16 weekend as the planned performance at Legacy Hall was a
17 success financially?

18 A. Yes, I believe it was.

19 Q. And do you have any information to indicate
20 that, in fact, it raised more than Spectrum expected for
21 the charity that it was supporting?

22 A. I believe it did, yes. I believe that's what
23 they said.

24 Q. Do you know of any reason why Spectrum could
25 not have held a drag show in Sam Houston Park or some

1 other non-campus venue in 2024?

2 MR. MORRIS: Objection; form.

3 A. No, I don't know.

4 Q. (BY MR. BRYANT) Do you know of any reason why
5 Spectrum cannot hold a drag show in a non-campus venue
6 in 2026 if it wanted to do so?

7 A. I'm not aware of any reason, no.

8 Q. I have been told -- and I haven't seen it --
9 that Spectrum has made an application to hold a drag
10 show at Legacy Hall in 2026.

11 Do you know anything about that?

12 A. No.

13 Q. Do you know Myss Myka personally?

14 A. Yes, we're acquaintances.

15 Q. I have been told that Myss Myka's driver's
16 license name or birth certificate name is Michael
17 Arredondo.

18 Is that correct?

19 A. To my knowledge, yes.

20 Q. And about how many times have you seen Myss
21 Myka perform in drag shows over the time that you have
22 been acquainted with Myss Myka?

23 A. Certainly more than five.

24 Q. Have you ever seen Myss Myka both emcee and
25 perform at a drag show?

1 A. I believe so, yes.

2 Q. And have you seen other drag queens in the
3 Amarillo and Canyon areas both perform and emcee at drag
4 shows?

5 A. I believe so, yes.

6 Q. Have you been to drag shows where there was
7 sexualized performance?

8 MR. MORRIS: Objection; vague.

9 A. Yes.

10 Q. (BY MR. BRYANT) Approximately how many?

11 A. Some.

12 Q. More than five?

13 A. Depends on the venue and the audience, but yes.

14 Q. Okay. And have you seen any drag shows that
15 you recall where Myss Myka performed in a sexualized
16 manner?

17 A. I don't recall specifically.

18 MR. BRYANT: I have no further questions.
19 Thank you very much for being here. I appreciate it.

20 THE WITNESS: Sure.

21 MR. MORRIS: Just a few follow-ups,
22 Mr. Chandler.

23 RE-EXAMINATION

24 BY MR. MORRIS:

25 Q. What's your understanding of Mr. Bryant's term

1 "sexualized?"

2 A. Having some sort of sexual nature to the
3 performance.

4 Q. Can you explain a little bit more?

5 A. Simulating or jokingly simulating some sort of
6 sexual movement.

7 Q. And you testified earlier that you didn't see
8 any of that at the 2023 drag show at Sam Houston Park.

9 Is that right?

10 A. Not that I recall, no.

11 Q. Did you have any reason to believe the show
12 they planned for Legacy Hall would involve any of that
13 sexualized conduct?

14 A. No.

15 Q. Would you expect students to have committed to
16 a PG-13 show if they were going to involve sexualized
17 conduct at a show at Legacy Hall?

18 A. I would have expected them to keep the content
19 appropriate for ages 13 and above.

20 Q. Okay.

21 MR. MORRIS: No further questions.

22 MR. BRYANT: No further questions. The
23 deposition is completed.

24 Mr. Chandler, we appreciate your going
25 through this very much.

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THE WITNESS: Thank you.
(Off record 2:59 p.m.)

CHANGES AND SIGNATURE
ORAL DEPOSITION OF CHIP CHANDLER
DECEMBER 9, 2025

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1 I, CHIP CHANDLER, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct except as noted above.

4
5
6 _____
CHIP CHANDLER

7 THE STATE OF _____)

8 COUNTY OF _____)

9
10 Before me, _____, on this day
11 personally appeared CHIP CHANDLER, known to me (or
12 proved to me under oath or through
13 _____) (description of identity card
14 or other document) to be the person whose name is
15 subscribed to the foregoing instrument and acknowledged
16 to me that they executed the same for the purposes and
17 consideration therein expressed.

18 Given under my hand and seal of office this _____
19 day of _____, _____.

20
21
22 _____
23 NOTARY PUBLIC IN AND FOR
24 THE STATE OF _____
25 COMMISSION EXPIRES: _____

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF TEXAS
3 AMARILLO DIVISION

4 SPECTRUM WT,)

5 Plaintiff,)

6 v.)

Case No. 2:23-cv-00048

7 WALTER WENDLER, in his)
8 official capacity as the)
9 President of West Texas)
10 A&M University, et al.,)

11 Defendants.)

12 REPORTER'S CERTIFICATION
13 ORAL DEPOSITION OF CHIP CHANDLER
14 DECEMBER 9, 2025 - CANYON, TEXAS

15 I, SHARON D. LIVINGSTON, Certified Shorthand
16 Reporter in and for the State of Texas, hereby certify
17 to the following:

18 That the witness, CHIP CHANDLER, was duly sworn by
19 the deposition officer and that the transcript of the
20 deposition is a true record of the testimony given by
21 the witness;

22 That pursuant to information given to the
23 deposition officer at the time said testimony was taken,
24 the following includes counsel for all parties of
25 record:

Mr. JT Morris and Mr. Adam Steinbaugh, Attorneys
for Plaintiff;

Mr. David Bryant and Ms. Munera Al-Fuhaid,

1 Attorneys for Defendants;

2 Ms. Hannah L. Rivera, Attorney for the Witness;

3 That the amount of time used by each party at the
4 deposition is as follows:

5 MR. MORRIS - 01 HOURS: 32 MINUTES

6 MR. BRYANT - 00 HOURS: 09 MINUTES

7 That the sworn deposition transcript was duly
8 submitted on DECEMBER 19, 2025 to the witness or to the
9 attorney for the witness for examination, signature, and
10 return to the deposition officer by JANUARY 22, 2026;

11 That the original deposition was/was not returned
12 to the deposition officer on JANUARY 22, 2026;

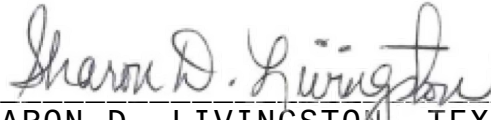
13 If returned, the attached Changes and Signature
14 page contains any changes and the reasons therefor;

15 If returned, the original deposition was delivered
16 to Mr. Adam Steinbaugh, Custodial Attorney, and
17 \$1,138.50 is the deposition officer's charges to the
18 PLAINTIFF for preparing the original deposition and any
19 copies of exhibits;

20 I further certify that I am neither counsel for,
21 related to, nor employed by any of the parties or
22 attorneys in the action in which this proceeding was
23 taken, and further, that I am not financially or
24 otherwise interested in the outcome of the action.

25 Certified to by me this _____ day of _____,

1 2025.

2
3
4 

5 SHARON D. LIVINGSTON, TEXAS CSR 3798
6 Expiration Date: 04-30-26
7 PANHANDLE COURT REPORTERS, LLC
8 Firm Registration No. 10057
9 P.O. Box 1564
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11 (806) 373-0602
12 Janice@pcramarillo.com
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